



SDMS DocID 2001258

September 29, 2003

Mr. Patrick Egan
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

**RE: Required Submission of Information
Lower Darby Creek Area Superfund Site -
Clearview Landfill, Folcroft Landfill & Folcroft Landfill Annex**

Dear Mr. Egan:

As I previously advised you by phone, The Franklin Mint is a different company from the entity that carried on business under that name between 1958 and 1976. In addition, it moved its location in the late 1960's and has changed computer systems. While we reviewed the Questions on Enclosure F with current employees, the passage of time, the change of the business and the move of locations made it virtually impossible to provide answers to many of your questions.

We have done the best we can. Of course, if you have further questions or require additional clarifications, please do not hesitate to contact me and we will try to provide the additional information.

Responses to Questions

1. Franklin Mint Company d/b/a The Franklin Mint, Franklin Center, Pennsylvania 19091, (610) 459-6000.
 - a. Franklin Mint Company is a Delaware general partnership created in 1985.
 - b. General Numismatics Corporation was incorporated in 1964. It subsequently changed its name to The Franklin Mint, Inc. and then to Franklin Mint Corporation. In March of 1981, Franklin Mint Corporation merged with and into Warner Communications, Inc. and then was spun off into a separate subsidiary named Franklin Mint Corporation. In 1985, a Delaware general partnership acquired all of the assets of Franklin Mint Corporation. That partnership is currently known as Franklin Mint Company and does business under the name of The Franklin Mint.

THE FRANKLIN MINT
Franklin Center, Pennsylvania 19091
Telephone 610-459-6000

Direct Dial 610-459-6184 Fax 610-459-6657
E-mail: hlucker@franklinmint.com

- c. **Franklin Mint Company**, a Delaware general partnership, is comprised of **Roll International Corporation**, a Delaware corporation; **FFP**, a California general partnership comprised of **Roll International Corporation**, a Delaware corporation; and **F-15 Corporation**, a Delaware corporation. [Throughout the years, Franklin Mint Company has had subsidiaries, fictitious names and other affiliates primarily for marketing purposes. None of those other entities conducted any manufacturing operations in the Commonwealth of Pennsylvania.]
2. Franklin Mint Company's headquarters are located at Route 1, Franklin Center, Pennsylvania. Its current activities at that location are primarily office-type activities relating to the management and operation of the direct response collectibles business. It operates customer service, marketing, and other non-manufacturing operations at the site.

Between 1964 when the General Numismatics Corporation was created through 1976, the predecessor to Franklin Mint Company manufactured coins and medals. In 1976 it began manufacturing porcelain products. In the late 1960's the company moved from Yeadon to its present location in Franklin Center, Pennsylvania. During part of 1976, it operated a porcelain manufacturing facility in Rockdale, Pennsylvania. After the move from Yeadon to Franklin Center, the primary manufacturing at Franklin Center was coins and medals. After 1976, the manufacturing in Pennsylvania diminished. The porcelain facility was closed in the early 1980's and manufacturing of coins and medals ultimately stopped in 2002.

3. As a result of the recollection of a few long-term employees and checking with the records in our Human Resource Department, I am listing below the information we have been able to gather:

<u>Name</u>	<u>Last Known Address</u>	<u>Last Known Phone Number</u>	<u>Employment Dates</u>	<u>Title (During Relevant Years)</u>
William Smith	[REDACTED]	[REDACTED]	12/20/70 - still active	Various (Supervisor Packaging to Plant Manager)
Carl Blessing	[REDACTED]	[REDACTED]	1/26/70 - 10/17/95	Unavailable
Harold Ricks	[REDACTED]	[REDACTED]	8/12/69 - 5/23/96	Inspection Supervisor
Jerome Pasquarella	[REDACTED]	[REDACTED]	5/19/69 - 3/5/99	Director, Quality Engr.

<u>Name</u>	<u>Last Known Address</u>	<u>Last Known Phone Number</u>	<u>Employment Dates</u>	<u>Title (During Relevant Years)</u>
Dick McClay	Unavailable	Unavailable	Unavailable	Unavailable
Jeff Stroud	Unavailable	Unavailable	Unavailable	Unavailable
Bill Donaldson	Unavailable	Unavailable	Unavailable	Unavailable
Fred Hammerly	Unavailable	Unavailable	Unavailable	Unavailable
Brian Harrison	Unavailable	Unavailable	Unavailable	President
Andy Cosgarea	Unavailable	Unavailable	Unavailable	Unavailable
Glenn Borous	Unavailable	Unavailable	Unavailable	Unavailable
Tom Downs	Unavailable	Unavailable	Unavailable	Vice President Manufacturing
Tom Gordon	Unavailable	Unavailable	Unavailable	Unavailable
Ed Luke	Unavailable	Unavailable	Unavailable	Unavailable
Chris Fabre	Unavailable	Unavailable	Unavailable	Unavailable
Al DeLelis	Unavailable	Unavailable	Unavailable	Unavailable

4. The information relating to the operation of the predecessor to Franklin Mint Company from 1958 through 1976 with some additional information as to later years is set forth as follows:
 - a. See responses to Question 1.
 - b. See responses to Question 2.
 - c. As a result of changes in personnel, the focus of the business, computer systems and destruction of documents archived for approximately eight years, we have been unable to locate any relevant documents for the years 1958 through 1976.
5. See response to 4c.
6. As described in the response to Question 2, the predecessor to Franklin Mint Company was primarily in the business of manufacturing coins and medals between its creation in 1964 and 1976. During 1976, it began manufacturing porcelain products. Aside from that, we are unable to find any specific information relating to the years 1958 through 1976.

7. As a result of the passage of time, changes in personnel, the focus of the business, changes in computer systems and prior destruction of documents, we have no information in response to Question 7.
8. We have checked on-site physical records, our current Accounts Payable computer files and the log of off-site storage boxes and have no record of dealing with any of the people or entities listed in Question 8 between 1958 and 1976.
9. Not applicable.
10. We have no information that the predecessor to Franklin Mint Company ever disposed of any material at "Clearview, Folcroft and Folcroft Annex or any other areas of the site."
11. Not applicable.
12. No.
13. As a result of our internal review, we have provided information about those people who we believe worked in or had knowledge of the manufacturing aspects of the business during the relevant years. Aside from that, we have no knowledge about their specific responsibilities.
14. We have no knowledge of anybody conducting any environmental assessments or investigations relating to the contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the site.
15. None.
16. a. Howard Lucker, Vice President and General Counsel of The Franklin Mint, Franklin Center, PA 19091. Telephone Number: 610-459-6184.
b. Same as a.
17. As a general proposition we follow the retention policies set forth by the Internal Revenue Code in 26 CFR 301.650 and have not destroyed key records for up to eight years. The identity of the records and people involved in the destruction of records from 1958 to 1976 is unknown.

Very truly yours,



Howard P. Lucker
Vice President and
General Counsel

HPL/pm